

John D. Lynch, Esq.  
1814 Kennedy Boulevard  
Union City, New Jersey 07087  
201-867-2008  
Attorney for Defendant,  
MICHAEL CHEFF

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

|                          |   |                                    |
|--------------------------|---|------------------------------------|
| UNITED STATES OF AMERICA | : | Hon. Katharine S. Hayden, U.S.D.J. |
|                          | : |                                    |
|                          | : | Criminal No. 20-cr-209(KSH)        |
| v.                       | : |                                    |
|                          | : | NOTICE OF MOTION FOR A             |
| MICHAEL CHEFF            | : | JUDGMENT OF ACQUITTAL OR           |
|                          | : | NEW TRIAL ON BEHALF OF             |
|                          | : | DEFENDANT, MICHAEL CHEFF           |

TO: Jihee Suh, A.U.S.A.  
United States Attorney's Office  
970 Broad Street  
Newark, New Jersey 07102

Thomas Kearny, A.U.S.A.  
United States Attorney's Office  
970 Broad Street  
Newark, New Jersey 07102

PLEASE TAKE NOTICE that on a date and time to be set by the Court, defendant MICHAEL CHEFF, through his attorneys John D. Lynch, Esq., and Paulette Pitt, Esq., shall move before the Honorable Katharine S. Hayden, U.S.D.J., United States Courthouse, Newark, New Jersey, for the following relief:

1. The entry of an Order for a Judgment of Acquittal pursuant to Rule 29 (C) of the Federal Rules of Criminal Procedure.

2. The entry of an Order Vacating the Judgement and Granting a New Trial pursuant to Rule 33 of the Federal Rules of Criminal Procedure.

**PLEASE TAKE FURTHER NOTICE** that the Court has granted the application of counsel for an extension of time within which to file briefs, and has set the following schedule in this matter:

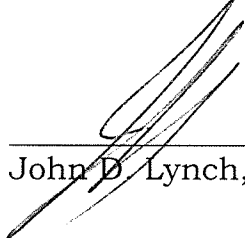
Defendant's Brief is due on or before June 23, 2022;

Government's Opposition Brief is due on or before July 8, 2022;

Defendant's Reply Brief is due on or before July 15, 2022.

Oral Argument is hereby requested.

Respectfully submitted



---

John D. Lynch, Esq.